

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 1071

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’
SIXTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)
(Reduced and Reclassified Claims, Reclassified Claims,
Substantive Duplicate Claims, Cross-Debtor Duplicate Claims)**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On June 4, 2025, the *Debtors’ Sixth Omnibus Objection to Certain Claims (Substantive) (Reduced and Reclassified Claims, Reclassified Claims, Substantive Duplicate Claims, Cross-Debtor Duplicate Claims)* [Docket No. 1071] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order as granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was June 25, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Prior to the Response Deadline, the Debtors received informal responses (collectively, the “Informal Responses”) to the Objection and Proposed Order from: (i) IG Design Group Americas, Inc.; (ii) Cherry Design Partners; (iii) CRG Financial LLC, as current holder of Claim No. 12007 (originally filed by Ningbo Tofoam Stationery Co Ltd.); (iv) Liberty Mutual Insurance Company; (v) Roth Bros., Inc. (a Sodexo Company); and (vi) Exmart International Private Limited (the “Exmart Claim”).

4. Additionally, prior to the Response Deadline, the Debtors received formal responses (collectively, the “Formal Responses” and together with the Informal Responses, the “Responses”) to the Objection and Proposed Order from: (i) Rohlig USA, LLC [Docket No. 1155]; (ii) Janome America Inc. [Docket No. 1279]; and (iii) Kenneth Lafayette [Docket No. 1291] (the “Lafayette Response”).

5. The Debtors have not received any other Responses to the Objection and Proposed Order.

6. To resolve the Responses,² the Debtors and the responding claimants, including the responding claimants’ counsel, if any, agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the “Revised Proposed Order”).

7. The Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience.

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² The unresolved Exmart Claim and Lafayette Response have been adjourned to the omnibus hearing currently scheduled for August 14, 2025 at 10:00 a.m. (prevailing Eastern Time).

Dated: July 9, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

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